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# County of San Diego

DEPARTMENT OF INFORMATION SERVICES

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

May 28, 1993

Federal Communications Commission  
Office of the Secretary  
1919 M Street, NW  
Washington, DC 20554

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RE: PR Docket No. 92-235

Dear Mr. Secretary:

The County of San Diego has reviewed the FCC proposed rulemaking to determine the potential impact on County operations. We believe this proposed rulemaking would have a major impact on County public safety radio communications. In particular, the County is concerned about the proposal to replace Part 90 with Part 88 to revise the Private Land Mobile Radio Services and modify the policies governing them.

The significant effects of the FCC Refarming Proposal - PR Docket No. 92-235, are as follows:

1. The proposal to reduce public safety channel bandwidth by 80 percent is based upon a time-table that, in our view, is unrealistically ambitious for the dates given for local government to have a new system operational. The FCC proposal contains assumptions that are in conflict with the reality of current technology. The majority of the radios currently in use and being produced cannot be converted to the narrowband requirements. The FCC transition schedule for compliance would require the County to start replacing its communications equipment as early as January 1, 1996. This assumes FCC-approved equipment would be available by this date.
2. The new channels created would be located within public safety channels and would be used by private "non-public safety" radio users. This would result in the degradation of public safety channels and could endanger the lives of the general public, police, fire, and public works personnel.
3. Radio frequency interference coordination would require multiple coordinators for each channel application. This would result in increased cost and processing time for local government since each channel request would have to be reviewed by more than one Frequency Coordination organization.

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**Federal Communications Commission**

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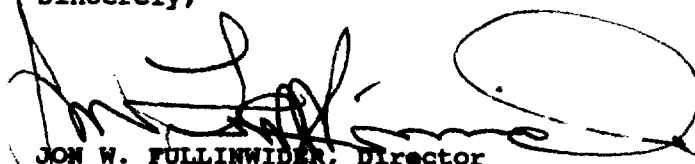
**May 28, 1993**

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4. Radio transmission power would have to be reduced, utilizing effective radiated power based on height above terrain. This would require significantly more transmitter sites because of the loss of radio coverage and system effectiveness. The County would have to attempt to construct additional communication sites to maintain present coverage. The proposed requirements could result in 50 percent loss of coverage for many of the sites located in the rural eastern area of the county. With existing land use controls by the County, State, and federal governments, it would be extremely difficult to obtain enough new sites to replace the loss of coverage.
5. No provisions have been made for declaring public safety communication facilities as an Essential Service in order to provide the necessary sites for radio coverage. Local governments are well acquainted with the problems of obtaining and constructing communication sites within an urban area. The possibility of installing necessary communications for the protection of life and property within State or federal parks is nearly impossible. To meet future requests for communication requirements resulting from new FCC requirements, the public safety communication services must be able to develop new sites.
6. No provisions have been made to resolve the communication interference problems which occur in the border area with Mexico. The local governments who are located within the influence of the border area are forced to deal with interference and operational problems not found elsewhere.

Local government is grossly underfunded and unable to provide all the services which otherwise would be desirable. The County of San Diego is no exception. The County is attempting to provide public safety communications that meet the current and future needs of this growing region with limited resources. Funding sources do not exist to accommodate the changes the FCC proposed rulemaking would produce.

Sincerely,



**JON W. FULLINWIDER, Director**  
Department of Information Services

JWF/bb

cc: Board of Supervisors  
CAO  
Department of Information Services  
Washington Representative